

REMARKS

Claims 1 and 26 have been amended by incorporating the recitations of claims 2 and 3 therein. Claims 2 and 3 have thereby been cancelled. Claim 24 has been amended to recite a fluoropolymer substrate. Entry of the above amendments is respectfully requested.

Review and reconsideration on the merits are further requested.

A Restriction Requirement under 35 U.S.C. § 121 has been entered. Applicants elect with traverse to prosecute the inventions encompassed in Group I, claims 1-25, drawn to an article. Applicants submit that claim 26, drawn to an apparatus, should be prosecuted with claims 1-25. Claim 26 recites the exact same xerographic component as in claim 1, but is directed to an image forming apparatus. The Office Action states that the xerographic component of claims 1-25 can be used in an electrolytic capacitor. Applicants submit that a xerographic component cannot be used in an electrolytic capacitor, as an electrolytic capacitor does not participate in xerography. Therefore, Applicants request that the Restriction Requirement be withdrawn and that claims 1-26 be prosecuted in the same case.

Claims 1-25 have been rejected under 35 U.S.C. § 112, second paragraph. In response, Applicants traverse the rejection.

The Office Action states that it is unclear what a xerographic component is. However, a xerographic component is defined throughout the specification. Specifically, Applicants direct the Examiner to page 1 of the present application, beginning at line 2, wherein it is recited that a xerographic component is useful in xerographic applications including digital, image on image, and contact electrostatic applications. It is further recited that the present invention relates to thiophene-based material coatings for transfer/transfuse, intermediate transfer, bias charging, bias transfer, fusing and the like xerographic components. Therefore, specific examples of xerographic components are given in the application, along with a general definition. Further discussion of xerographic components is set forth on page 1, lines 14-17, and at page 2, lines 1-16, and again, on page 2 starting at line 25 through page 3, line 24.

Accordingly, because the present specification clearly defines what a xerographic component is, Applicants submit that the claims comply with the requirements of 35 U.S.C. § 112, second paragraph, and respectfully request withdrawal of the rejection.

Claims 1-3, 5-8 and 24-25 have been rejected under 35 U.S.C. § 102(b) as anticipated by Jonas et al. In response, Applicants traverse the rejection.

The independent claims have been amended to recite a substrate for the xerographic component comprising a polymer selected from the group consisting of fluoropolymers, chloropolymers, silicone rubbers, polyarylenes, ethylene diene propene monomer, nitrile rubbers and mixtures thereof. Applicants submit that Jonas et al. does not teach or suggest the recited substrate. Examples of substrates are set forth in Jonas et al. at column 3, lines 19-30 and again at lines 54-57. Applicants point out that although Jonas et al. does teach a silicone nitride substrate, Jonas et al. sets forth that this is an inorganic substrate. Therefore, Jonas et al. does not teach or suggest the claimed nitrile rubbers.

Because Jonas et al. does not teach or suggest each and every element of the claim, Applicants submit that the present claims, as amended, are not anticipated by Jonas et al., and request withdrawal of the rejection of claims 1-3, 5-8 and 24-25 under 35 U.S.C. § 102(b) as anticipated by Jonas et al.

Claims 1-3, 5-13, 16-18, 20-22, 24 and 25 have been rejected under 35 U.S.C. § 103(a) as obvious over Tarumi et al. in view of Jonas et al. In response, Applicants traverse the rejection.

Tarumi et al. relates to an intermediate transfer roller. Tarumi et al. further teaches various possible layers for the transfer member. Although Tarumi et al. teaches a variety of materials for the numerous layers of the transfer members, as recognized by the Examiner, Tarumi et al. does not teach or suggest use of a thiophene-based material as a coating. In addition, Tarumi et al. does not teach or suggest a substrate having the claimed polymers, in combination with a thiophene-based coating material. Instead, the reference teaches numerous combinations of various layers.

The Examiner relies on Jonas et al. as teaching a thiophene-based material and states that it would have been obvious to use the thiophene-based material of Jonas et al. in combination with Tarumi et al. Applicants submit that one of ordinary skill in the art would not have been motivated to combine the references. In addition, even if the references were combined, the resulting invention would not result in the claimed layer structure.

The Office Action has not pointed to anywhere in either of the references which would provide a motivation for the claimed combination of layers. In addition, Tarumi et al. teaches an intermediate transfer member, whereas Jonas et al. relates to conductive polythiophene formulations for electrodes in electroluminescent displays or for solid capacitors, and for picture production such as silver halide photography dry-plate systems in electrophotography. Applicants submit that one of ordinary skill in the art would not have been motivated to combine layers from an intermediate transfer member with a coating taught as useful in photography, solid capacitors, or electroluminescent displays.

In view of the above arguments, Applicants submit that the present claims are not rendered obvious in view of the references. Accordingly, Applicants request withdrawal of the rejection of claims 1-3, 5-13, 16-18, 20-22, 24 and 25 under 35 U.S.C. § 103(a) as obvious over Tarumi et al. in view of Jonas et al.

Claims 4, 19 and 23 have been rejected under U.S.C. § 103(a) as obvious over Tarumi et al. in view of Jonas et al. and Newkirk. In response, Applicants traverse the rejection.

Because claims 4, 19 and 23 ultimately depend from claim 1, Applicants repeat the arguments made above in view of the combination of Tarumi et al. in view of Jonas et al. Applicants submit that Newkirk does not provide the deficiencies of the primary references, in that Newkirk does not provide motivation for using the claimed polymer substrate with an outer thiophene-based material coating. In addition, Applicants submit that one of ordinary skill in the art would not have been motivated to combine these three references because of their diverse teachings. Specifically, Jonas et al. relates to thiophene-based materials useful for coating electrodes in the electrical arts and for use in picture production. Tarumi et

al. relates to intermediate transfer member coatings. Newkirk relates to fuser member coatings. One of ordinary skill in the art would not have been motivated to use as a substrate, an intermediate coating of an intermediate transfer member as taught by Tarumi et al., and substitute a specific fluoroelastomer of a fuser member for that coating, and subsequently coat the fluoroelastomer with a thiophene-based material taught as useful as a coating in the electrical arts and for picture making as taught by Jonas et al. To make such changes to each of the references and end up with the claimed invention could only be achieved in hindsight.

In view of the above arguments, Applicants submit that the present claims are not obvious in view of the references, and request withdrawal of the rejection of claims 4, 19 and 23 under 35 U.S.C. § 103(a) as obvious over Tarumi et al. in view of Jonas et al. and Newkirk.

Claim 4 has been rejected under 35 U.S.C. § 103(a) as obvious over Tarumi et al. in view of Jonas et al. and Chen et al. In response, Applicants traverse the rejection.

Because claim 4 depends ultimately from claim 1, Applicants repeat the above arguments of Tarumi et al. in view of Jonas et al. Applicants further submit that Chen et al. does not provide the deficiencies of the primary and secondary references, in that Chen et al. does not provide motivation for combining a fluoropolymer layer as taught by Tarumi et al. with a thiophene coating as taught by Jonas et al. In addition, Applicants submit that one of ordinary skill in the art would not have been motivated to combine the three references, and assuming that the references were combinable, Applicants submit that the combination would not result in the claimed invention.

Specifically, one of ordinary skill in the art would not have been motivated to combine a layer taught for use in an intermediate transfer member as taught by Tarumi et al. with a coating taught by Jonas et al. as a coating for electrodes and for use in picture production, and substitute the fluoropolymer layer of Tarumi et al. with the specific fluoroelastomers as taught by Chen et al. as a layer for use in fuser members. Applicants submit that one of ordinary skill in the art would not have been motivated to combine such diverse references relating to fuser members

(Chen et al.), intermediate transfer members (Tarumi et al.), in electrodes in picture production (Jonas et al.).

In addition, Applicants submit that even if the references were combined, the resulting invention would not read on the present claims. Instead, the resulting invention would be an intermediate fluoroelastomer layer as taught by Chen et al. and Tarumi et al., instead of the claimed fluoropolymer substrate.

In view of the above arguments, Applicants submit that claim 4 is not obvious in view of the three references. Accordingly, Applicants request withdrawal of the rejection of claim 4 under 35 U.S.C. § 103(a) as obvious over Tarumi et al. in view of Jonas et al. and Chen et al.

Claims 14-15 have been rejected under 35 U.S.C. § 103(a) as obvious over Tarumi et al. in view of Krafft et al. In response, Applicants traverse the rejection.

Claims 14-15 ultimately depend from claim 1 which includes the recitation of a substrate comprising a polymer selected from the group recited in amended claim 1. Applicants submit that Krafft et al. does not teach or suggest the deficiencies of the primary reference, in that Krafft et al. does not teach or suggest the claimed substrate.

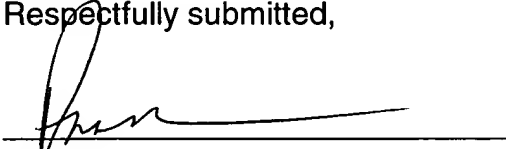
Because the cited combination does not teach or suggest the elements of the claims, Applicants submit that the rejected claims are not obvious in view of the combination. Accordingly, Applicants request the withdrawal of the rejection of claims 14-15 under 35 U.S.C. § 103(a) as obvious over Tarumi et al. in view of Krafft et al.

In view of the above arguments, Applicants submit that all claims should now be in condition for allowance. Early indication of allowability is respectfully requested.

No additional fee is believed to be required for this amendment. However, the undersigned Xerox Corporation Attorney hereby authorizes the charging of any necessary fees, other than the issue fee, to Xerox Corporation Deposit Account No. 24-0025. This also constitutes a request for any needed extension of time and authorization to charge all fees therefor to Xerox Corporation Deposit Account No. 24-0025.

In the event the Examiner considers personal contact advantageous to the disposition of this case, s/he is hereby authorized to call Applicant's Attorney, Annette L. Bade, at telephone number (716) 423-2050, Rochester, New York.

Respectfully submitted,



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